

TSD File Inventory Index

Date: April 7, 2006

Initial: CMB/Garcia

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Comments:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 30 2004

REPLY TO THE ATTENTION OF:

C-14J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Art Savage
Interim Vice Chancellor for Administration
University of Illinois at Chicago (MC 106)
1140 South Paulina Street
Chicago, Illinois 60612-7217

Re: Self-Disclosure of RCRA violations at the University of Illinois - Chicago Campus

Dear Dr. Savage:


Enclosed please find a Notice of Determination which sets forth the United States Environmental Protection Agency's determination regarding certain violations of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901-6992k, and its implementing regulations found at 40 C.F.R. parts 262, 265, 268 and 280, by the University of Illinois - Chicago, located at 1140 South Paulina Street, Chicago, Illinois. By virtue of the State of Illinois' receipt of authorization to implement its own hazardous waste management program pursuant to section 3006(a) of RCRA, 42 U.S.C. § 6926(a), Illinois regulations found at parts 722, 725 and 728 of the Illinois Administrative Code operate in lieu of the federal regulations found at 40 C.F.R. parts 262, 265 and 268.

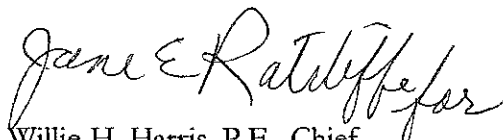
U.S. EPA's determination is based on the policy on "Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations," found at 60 Fed. Reg. 66706 (December 22, 1995) and information provided by your organization on February 20, 2001. This policy is also available on the U.S. EPA's website, "www.epa.gov/compliance/incentives/auditing/auditpolicy.html".

U.S. EPA has determined that the University has met all nine of the conditions set forth in section D of that policy, which will result in the assessment of no gravity-based penalty against the University. Because it does not appear that any discernible economic benefit accrued to the University as a result of the disclosed violations, U.S. EPA will assess no monetary penalty.

If you have any questions, please feel free to contact Robert S. Guenther, Associate Regional Counsel, at (312) 886-0566. Thank you for your cooperation.

Yours very truly,

for 
Lorna M. Jurega
Harriet P. Croke, Acting Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division


Jane E. Ratcliffe
Willie H. Harris, P.E., Chief
Program Management Branch
Waste, Pesticides and Toxics Division

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**UNIVERSITY OF ILLINOIS - CHICAGO
CHICAGO, ILLINOIS.**

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NOTICE OF DETERMINATION

Pursuant to our policy, "Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations," 60 Fed. Reg. 66706 (December 22, 1995) (the "Self-Disclosure Policy"), the United States Environmental Protection Agency issues this Notice of Determination regarding violations of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6901-6992k, and its implementing regulations, by the University of Illinois - Chicago, located at 1140 South Paulina Street, Chicago, Illinois..

The University disclosed the violations subject to this Notice to U.S. EPA by letter dated February 20, 2001, attached. The University disclosed a number of violations involving several buildings on its campus.

I. SELF-DISCLOSURE POLICY

To encourage regulated entities to conduct voluntary compliance evaluations and to voluntarily discover, disclose and correct violations of environmental requirements, U.S. EPA promulgated its Self-Disclosure Policy. As an incentive for regulated entities to participate in the Self-Disclosure Policy's voluntary process, U.S. EPA may eliminate or substantially reduce the gravity-based component of civil penalties to be assessed for violations which are voluntarily disclosed in compliance with the conditions specified in the Self-Disclosure Policy. Briefly, the conditions of the Self-Disclosure Policy are as follows:

- (1) discovery of the violations through an environmental audit or due diligence;

- (2) voluntary discovery;
- (3) prompt disclosure;
- (4) discovery and disclosure independent of government or third party plaintiff;
- (5) prompt correction and remediation;
- (6) prevention of recurrence of the violation;
- (7) absence of repeat violations;
- (8) other violations excluded; and
- (9) cooperation with U.S. EPA.

Pursuant to the Self-Disclosure Policy, U.S. EPA may reduce gravity-based penalties entirely if the disclosing party satisfies all of the conditions described above. U.S. EPA may reduce gravity based penalties by three-quarters if the disclosing party meets all requirements except the first one. However, U.S. EPA reserves the right to assess a civil penalty with regard to any economic benefit that a violator may have realized as a result of such violations, even in those instances when the disclosing party has met all the conditions of the policy. In its enforcement discretion, U.S. EPA may waive a civil penalty with regard to economic benefit accruing to the violator if U.S. EPA determines that such economic benefit is insignificant. Penalty reductions are not available under the policy for violations that result in serious actual harm or may present an imminent and substantial endangerment to public health or the environment, nor are such reductions available for violations of any order or consent agreement.

II. FINDINGS OF FACT

1. On February 20, 2001, the University sent a letter to U.S. EPA disclosing 25 violations of RCRA and its implementing regulations, 35 Illinois Administrative Code Parts 722, 725 and 728, which are federally-authorized corollaries at least as stringent as federal regulations

found at 40 C.F.R. parts 262, 265 and 268. The correspondence further disclosed violations of federal regulations found at 40 C.F.R. part 280 governing the maintenance and operation of underground storage tanks. The correspondence described violations of these regulations occurring at various locations on the University's campus. The letter is Attachment 1.

2. Based on the information provided in the letter of February 20, 2001, and subsequent communications between the University and U.S. EPA, for each of the voluntary disclosures identified in the letter, U.S. EPA has determined that the University has met each of the following conditions set forth in the Self-Disclosure Policy:

- (1) The University discovered the violations as part of a periodic environmental audit conducted by its staff;
- (2) The University's violations were identified voluntarily, and not through monitoring, sampling or auditing required by state or federal statute, regulation, permit or judicial or administrative order;
- (3) The University disclosed its violations within ten days of their discovery;
- (4) The University discovered and disclosed its violations prior to the commencement of any federal, state or local agency inspection, investigation or information request, notice of a citizen suit, legal complaint by a third party, reporting of the violation by a "whistle blower" employee or imminent discovery of the violations by any regulatory agency;
- (5) The University promptly rectified the violations;
- (6) The University has taken sufficient measures to prevent a recurrence of the violations, including instituting training, management practices and institutional controls;
- (7) The violations disclosed or violations of a similar nature have not occurred within the previous three years and do not represent a pattern of violations on behalf of the University for the past five years. The violations at issue have not been the subject of any federal, state or local agency judicial or administrative complaint, enforcement action or settlement, nor has the University or a parent organization received penalty mitigation concerning the violations at issue during the three years prior to the issuance of this Notice;

- (8) The violations at issue have not resulted in actual harm to human health or the environment, nor have the violations presented an imminent and substantial threat to public health or the environment. The violations at issue do not violate the specific terms of any judicial or administrative order or consent agreement; and
- (9) The University has cooperated fully with U.S. EPA and provided all requested information necessary to determine the proper application of the Self-Disclosure Policy to the disclosed violations.

III. DISCLOSED VIOLATIONS

By letter dated February 20, 2001, the University of Illinois - Chicago disclosed the following violations occurring at the following locations on its campus:

At the Environmental Safety Facility, 1110 South Paulina Avenue:

1. The University failed to document the annual review of its training manual and to document job titles, employees and responsibilities for hazardous waste operations, in violation of 35 Ill. Admin. Code § 725.116.
2. The University failed to properly label waste containers in the Environmental Safety Facility, in violation of 35 Ill. Admin. Code § 722.134.
3. The University failed to ship a drum of hazardous waste at the Environmental Safety Facility within 90 days, in violation of 35 Ill. Admin. Code § 722.134.
4. The University failed to report waste minimization information for the Environmental Safety Facility on annual reports for the years 1997 -1999, in violation of 35 Ill. Admin. Code § 722.141.
5. The University failed to securely close and seal hazardous waste containers at the Environmental Safety Facility, in violation of 35 Ill. Admin. Code § 725.273.
6. The University failed to document all responsibilities of the emergency coordinator in its contingency plan for the Environmental Safety Facility, as required by 35 Ill. Admin. Code § 725.152(a).
7. The University failed to document available emergency equipment in its contingency plan for the Environmental Safety Facility, in violation of 35 Ill. Admin. Code § 725.156.

At its Utilities Building located at 1140 South Morgan Street:

1. The University failed to properly label waste containers at the facilities at its Utilities Building, in violation of 35 Ill. Admin. Code § 722.134.
2. The University failed to keep manifests of hazardous waste disposal at its Utilities Building for at least three years, as required by 35 Ill. Admin. Code § 722.140.
3. The University failed to include a description of arrangements with outside responding agencies in its contingency plan for the Utilities Building, as required by 35 Ill. Admin. Code § 725.152(e).
4. The University failed to identify and manage a drum of parts washer solvent as a hazardous waste at the Utilities Building, as required by 35 Ill. Admin. Code § 722.111.
5. The University failed to submit reports regarding the progress of its cleanup of contamination from eight underground storage tanks at the Utilities Building, as required by 40 C.F.R. §§ 280.50, 280.53, 280.60 and 280.67.
6. The University failed to submit adequate initial and follow-up reporting for eight underground gasoline storage tanks located at the Utilities Building in violation of 40 C.F.R. §§ 280.50, 280.53, 280.60 and 280.67.

At its North Clinical Sciences Building, 820 South Wood Street:

1. The University failed to train its personnel handling radioactive waste at its North Clinical Sciences Building in all aspects of its proper management under the regulations, in violation of 35 Ill. Admin. Code § 725.116.
2. The University failed to properly maintain records regarding its storage of mixed radioactive waste at its North Clinical Sciences Building, in violation of 35 Ill. Admin. Code § 725.274.
3. The University failed to include in its contingency plan for the North Clinical Sciences Building the area in which it stored mixed radioactive waste, in violation of 35 Ill. Admin. Code § 725.151.

At its Steam Plant, 1717 West Taylor Avenue:

1. The University failed to label drums of hazardous waste at its Steam Plant with accumulation start dates and with a label stating "Hazardous Waste," in violation of 35 Ill. Admin. Code § 722.134.
2. The University failed to describe in its contingency plan for the Steam Plant arrangements agreed to by local police and fire departments, hospitals, contractors

and state and local emergency response services, in violation of 35 Ill. Admin. Code § 725.152(c).

3. The University failed to document inspections of its 90-day storage facility at its Steam Plant, in violation of 35 Ill. Admin. Code § 722.274.

At its Science and Engineering Laboratories ("SEL"), 900 West Taylor Street; Science and Engineering South Building ("SES"), 845 West Taylor Street; and the UIC Medical Center ("UICMC"), 1740 West Taylor Street:

1. The University failed to label waste containers in satellite accumulation areas located in rooms 3202, 3209 and 3214 of the SEL; rooms 3317, 3319, 3363, 3455, 4226, 4255, 4259, 4225, 4455-4463, 5115, 5119, 5125, and 5223 of the SES; and room 3130 of the UICMC; in violation of 35 Ill. Admin. Code § 722.134.
2. The University failed to close waste containers in satellite accumulation areas located in rooms 3202 and 3214 of the SEL; rooms 3317, 3319, 3363 and 5223 of the SES; and room 3130 of the UICMC; in violation of 35 Ill. Admin. Code § 725.273.
3. The University failed to use containers in good condition in the satellite accumulation area of room 3202 of the SEL, in violation of 35 Ill. Admin. Code § 725.271.

At its facilities at 1140 South Paulina Avenue:

1. The University failed to identify paint chips as hazardous waste, in violation of 35 Ill. Admin. Code § 721.124.

At its facilities at 928 W. 14th Place:

1. The University failed to submit adequate initial and follow-up reporting for two underground gasoline storage tanks located at the facilities at 928 W. 14th Street in violation of 40 C.F.R. §§ 280.50, 280.53, 280.60 and 280.67.

At its Physical Plant, located at 1100 South Morgan Street:

1. The University failed to submit adequate initial and follow-up reporting for one 10,000 gallon underground gasoline storage tank located at the Physical Plant in violation of 40 C.F.R. §§ 280.50, 280.53, 280.60 and 280.67.

IV. AGENCY DETERMINATION

Pursuant to the Self-Disclosure Policy, and based on the information provided by the University, U.S. EPA makes the following determination concerning the violations described above:

- (1) The University has met all nine conditions in section D of the Self-Disclosure Policy, and thus, is eligible for a waiver of all gravity-based penalties for these violations;
- (2) No significantly discernible economic benefit accrued to the University as a result of the violations discussed above; and
- (3) Pursuant to the Self-Disclosure Policy, U.S. EPA will not assess any gravity-based penalty against the University of Illinois - Chicago for the violations discussed above or seek recovery of any economic benefit.

V. RESERVATION OF RIGHTS

U.S. EPA bases this determination upon the information provided by the University and relies upon its good faith representations in rendering this determination. In the event, however, the representations of the University are found to be incorrect, U.S. EPA reserves the right to revoke this Notice of Determination and render it of no legal consequence. If and to the extent that any information or certification provided by the University, upon which any civil penalty mitigation granted herein for such violations was based, was materially false or inaccurate at the time it provided U.S. EPA such information or certification, U.S. EPA reserves the right to assess and collect any and all civil penalties for any violations described in this Notice. U.S. EPA will render any revocation in writing, which will become effective upon receipt by the University. In issuing

this Notice of Determination, U.S. EPA seeks to promote self-auditing by the University of Illinois - Chicago and expects the University to be in full compliance with regulatory requirements and to continue the internal procedures necessary to prevent recurrence of the violations.

for *Laura M. Jureya*
Harriet P. Croke, Acting Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Date: *9/30/04*

Jane E. Ratcliffe for
Willie H. Harris, P.E., Chief
Program Management Branch
Waste, Pesticides and Toxics Division

UNIVERSITY OF ILLINOIS
AT CHICAGO

Office of the Vice Chancellor for Administration (MC 106)
1140 South Paulina Street
Chicago, Illinois 60612-7217

Stanton Delaney, PhD
Vice Chancellor for Administration
Executive Director—South Campus Development

February 20, 2001

Tinka Hyde, Regional Team Manager
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency, Region 5 E-19J
77 West Jackson Boulevard Chicago, Illinois 60604

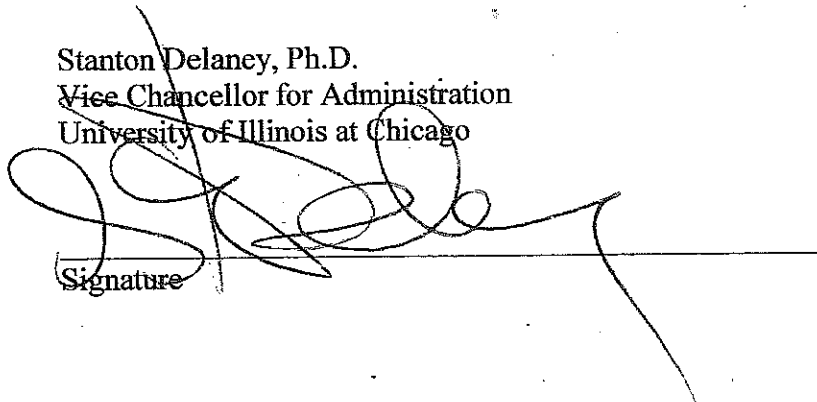
Dear Ms. Hyde:

The University of Illinois at Chicago has taken a proactive position towards environmental stewardship. As part of our focus on developing a culture of environmental responsibility, we contracted independent third party resources to perform a four-phase voluntary regulatory compliance audit. We have discovered violations that we are self-disclosing for consideration under the EPA Audit Policy. Each violation is disclosed on a separate enclosed Voluntary Disclosure Statement. It is our intent not only to correct these violations in the prescribed time frame, but to complete the development and implementation of an Environmental Management System that will enable us to be a role model for our students and our community.

I certify that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information contained in or accompanying this document is true, accurate, and complete.

In closing, I request that any public disclosure of the information contained herein be withheld pending appropriate discussions between our respective offices.

Stanton Delaney, Ph.D.
Vice Chancellor for Administration
University of Illinois at Chicago


Signature

UIC

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Review of records and reports and visual inspection
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Boelter & Yates Inc. was hired by UIC to perform a voluntary audit for EPA/IEPA asbestos, lead paint, and underground storage tanks laws as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

943 S. Maxwell St. , 1140 S. Morgan St., and 1100 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 280.50,280.53,280.60,280.67

Failure to submit required reports.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 2/13/2001

Description of how the violation was corrected:

Energy manager of Utilities closed two tanks and auditors were authorized to close the third tank with IEPA. Confirmed by the Director of EHS 2/13/2001.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Corrective action and closure has been completed for all the tanks.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

There is no evidence of environmental or human harm caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.
Prepare and execute standardized Management program for USTs. Train staff for complying with the Management program. Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No reported releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No reported releases or exposures occurred.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Boelter & Yates to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Review of records and reports and visual inspection
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Boelter & Yates Inc. was hired by UIC to perform a voluntary audit for EPA/IEPA asbestos, lead paint, and underground storage tanks laws as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

931 S. Hermitage Ave., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CDR 280.70-280.74

Failure to properly close or remove or abandon a UST system.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

The UST will be removed and closed in accordance with local, state and federal regulations and the removal activities will be documented. A contract proposal has been requested from Boelter & Yates for this work and will be performed as soon as their schedule permits, within 60 days if possible.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

There is no evidence of spills or leaks from the tank. The tank is believed to be empty. No reported environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Prepare and execute standardized Management Program for USTs. Train staff for complying with the Management program. Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No reported releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The tank is underground so it did not present an imminent and substantial endangerment to human health. There are no drinking water sources located in proximity to this area.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Boelter & Yates to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Review of records and reports and visual inspection
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Boelter & Yates Inc. was hired by UIC to perform a voluntary audit for EPA/IEPA asbestos, lead paint, and underground storage tanks laws as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
928 W. 14 th Place, Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<p><i>Specific Requirement Involved:</i> 40 CFR 280.50,280.53,280.60,280.67</p> <p>Failure to submit required reports. Failure to perform corrective actions.</p>

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p><i>If yes, when was it corrected?</i> _____</p> <p><i>Description of how the violation was corrected:</i></p>	
<p><i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i></p> <p>The West 14th Place tank was removed but Phase II Subsurface Soil Investigation has not been completed, nor closure documents submitted. Completion of these items will occur in conjunction with the South Campus project and will be completed within 60 days.</p>	
<p><i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i></p> <p>There is no evidence of environmental or human harm caused by the violation.</p>	

VIII. CONDITION 6 - PREVENT RECURRENCE
<p><i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i></p> <p>Prepare and execute standardized Management program for USTs. Train staff for complying with the Management program. Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.</p>

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No reported releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No reported releases or exposures occurred.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Boelter & Yates to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

TO RCRA

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Review of records and reports by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001
- C. *Relationship Between Auditors and UIC* - Boelter & Yates Inc. was hired by UIC to perform a voluntary audit for EPA/IEPA asbestos, lead paint, and underground storage tanks laws as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

UIC Campus c/o 1140 S. Paulina St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 261.24

Failure to perform testing of paint chip debris to determine disposal requirements.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

50 days to complete and implement a campus-wide Lead Based Paint Management Program with review and approval by EHS licensed LBP Inspector and Risk Assessor.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any environmental or human harm.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Within 50 days a Lead Based Paint Management Program, currently in draft form, will be implemented. This Program addresses all necessary components to insure proper testing for and disposal of lead based paint. Program dissemination and training will be provided by EHS staff to all applicable personnel.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any environmental or human harm.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any imminent and substantial endangerment to human health or the environment.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Boelter & Yates to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

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Chicago, IL 60612

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Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.174

(264.174)

Failure to document inspections of 90-day storage facility

There is no
requirement to
document inspection

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

[X]

If yes, when was it corrected? 2/20/2001

Description of how the violation was corrected:

An inspection checklist has been sent to the Utilities Office for implementation.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.
Employees will be informed of the inspection program. In addition the following steps will be taken:

- Prepare and execute standardized management program for RCRA,
- Train the staff for complying with the program,
- Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

• CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

• CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
This violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None.

• **CONDITION 9 - COOPERATION**

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

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Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 262.34
Failure to ship a drum of hazardous waste within 90 days as required for Large Quantity Generator.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> June 24, 2000 and 2/01/2001	
<i>Description of how the violation was corrected:</i> Waste was shipped 2 days late according to records. Since identification of the violation, a revised inventory procedure was established..	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i>	
No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i>
A physical inventory and electronic inventory of items remaining in storage is conducted monthly, after each waste shipment. At that time any remaining items are evaluated to determine future shipping dates.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i>	
Not Applicable	
<i>Similar violations at the parent company?</i>	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. Waste collected on March 23, 2000 was shipped on June 23, 2000. This exceeded the time limit by 2 days.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

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Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

UIC Steam Plant, 1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.52 (c)

Failure to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response services.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? February 15, 2001

Description of how the violation was corrected:

Description of arrangements was expanded in text of Contingency plan. Contingency plan was faxed to appropriate authorities.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

An SOP was prepared indicating that the plan should be reviewed. Also EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility and the contingency plan was not activated.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment as the contingency plan had been submitted to authorities in the past and the respective responsibilities were understood.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None

XI. CONDITION 9 - COOPERATION
Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.
The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED	
Clinical Sciences North 820 S. Wood St. Chicago, IL 60612	
VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.174	<i>Date of Discovery</i>
<i>Nature of the violation:</i> Inspection records for mixed radioactive waste containers were not maintained.	
<i>Identify who discovered the violation:</i> Outside Auditor - Hygieneering	
<i>Describe how the violation was detected:</i> Inspection of mixed waste storage facility.	

Records for weekly container inspection not required

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> By February 02, 2001	
<i>Description of how the violation was corrected:</i> An inspection log form was created and weekly inspections were initiated.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i> The inspection log is routinely checked for completion by the mixed waste supervisor.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. In the past periodic inspections of containers were performed, but not necessarily at the required frequency and records were not maintained. However, no leakage or container deterioration was ever noted including during the transfer of waste to licensed brokers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. Quantities involved are small, less than 30 gallons are accumulated at any one time. Containers have not leaked and the storage area was and is visited at least a few times each week.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Clinical Sciences North 820 S. Wood St. Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.51	<i>Date of Discovery:</i> February 01, 2001
<i>Nature of the violation:</i> The contingency plan does not include the area in which mixed radioactive waste is stored.	
<i>Identify who discovered the violation:</i> Outside auditor - Hygieneering	
<i>Describe how the violation was detected:</i> Contingency plan review.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>If yes, when was it corrected?</i> <i>Description of how the violation was corrected:</i>	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i> A contingency plan will be completed and approved within 60 days of disclosure. First draft is being reviewed at this time.	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by this violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i> A contingency plan will be authored for the mixed radioactive waste storage area. The plan will be approved by the UIC Radiation Safety Officer and EHSO Director and will be reviewed as required on an annual basis. Authoring and approval of the manual plan will be completed within 60 days of discovery.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

Failure to have a contingency plan did not result in serious actual harm to human health or the environment. Emergency procedures for cleaning radioactive material spills were in place. All personnel who handle waste are provided with extensive training. An emergency response kit is available and is periodically inspected to ensure the contents are intact.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

This violation did not present an imminent and substantial endangerment to human health or the environment. See above information for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1140 South Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Failure to label drums of hazardous waste

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Identification of the contents of the drum was provided today by the Utilities Director. They were left by an old contractor and allowed to just sit there. They were closed but not labeled. There were no leaks. Preparations are underway 2/20/2001 for proper labeling and removal.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. The employees did not handle the drums and no releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 265.173
Failure to securely close or seal waste containers.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> Week of February 5, 2001	
<i>Description of how the violation was corrected:</i> The container, which could not be sealed, was overpacked pending shipment to an authorized waste broker.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i>	
No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i>
Instructions are being provided to waste generators in a Hazardous Waste Management manual that instructs personnel who generate waste to collect waste only in containers in good condition with screw top lids. Waste will not be collected from satellite accumulation areas if it is not properly closed or sealed.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i>	
Not Applicable	
<i>Similar violations at the parent company?</i>	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. These containers were less than 1 liter in size and were closed. Secondary containment was provided for them during transport and storage at the waste storage facility. No spills or releases occurred from these containers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<p><i>Specific Requirement Involved:</i> 40 CFR 262 and 265 Subparts A through E</p> <p>Failure to label and manage a drum of parts washer solvent as a hazardous waste.</p>

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p><i>If yes, when was it corrected?</i> _____</p> <p><i>Description of how the violation was corrected:</i></p>	
<p><i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i></p> <p>The material has been identified as mineral spirits. A hazardous waste manual is currently being completed that will be distributed to Facilities Maintenance. Also, FM employees will be instructed to keep the waste collection container properly label .</p> <p>EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.</p>	
<p><i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i></p> <p>The drum will be properly disposed when filled. There is no evidence of environmental or human harm caused by the violation.</p>	

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.
A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

EPA VOLUNTARY DISCLOSURE STATEMENT

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Phone: (312) 413-8732
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II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Environmental Safety Facility
1110 S. Paulina
Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.56

Date Detected: 02/01/01

Nature of the violation:

Failure to document available emergency equipment in contingency plan.

Identify who discovered the violation:

Outside auditors - Hygieneering Inc.

Describe how the violation was detected:

The auditor reviewed the written contingency plan with regard to listing of emergency equipment.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 2./16/01

Description of how the violation was corrected:

The list of equipment was included in the contingency plan.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A Standard Operating Procedure (SOP) was prepared indicating that the plan should be reviewed. Also, EHSO will conduct annual environmental audits to evaluate compliance and develop an action plan for any identified items of non-compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. Adequate decontamination equipment was available and all emergency response personnel knew its location. This was a failure to document only.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. Adequate decontamination equipment was available and all emergency response personnel knew its location. This was a failure to document only.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
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Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Clinical Sciences North
820 S. Wood St.
Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 165.16

Date of Discovery: February 01, 2001

Nature of the violation:

Personnel handling mixed radioactive wastes were not trained in all aspects of 40 CFR 165.16.

Identify who discovered the violation:

Outside auditors - Hygieneering

Describe how the violation was detected:

Review of training records by auditor.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

This violation will be corrected within 60 days of discovery.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Training topics required by 40 CFR 265.16 will be added to the training module for collection and storage of mixed radioactive waste. Annual refresher training will be provided as required. Departmental management will periodically review training records to ensure compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

[] Yes
[X] No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. All personnel collecting and storing mixed radioactive waste have a significant amount of radiation safety training including a 6 hour course in general radiation safety topics. In addition they have completed several department training modules regarding the specific jobs they are expected to perform, including collection and storage of radioactive waste. All personnel functioning in this capacity are closely supervised.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See comments above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

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Chicago, IL 60612

Phone: (312) 413-8732
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email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Science and Engineering Laboratories
900 W. Taylor
Chicago, IL

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.171

Failure to use containers in good condition in satellite accumulation area in room 3202 SEL. Pour spouts were cut off of waste containers.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

[X] Yes

[] No

If yes, when was it corrected? The week of February 5, 2001.

Description of how the violation was corrected: The waste was transferred to a container that was in good condition.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to use containers in good condition. In addition the following steps will be taken:

- Prepare and execute standardized Management program for RCRA compliance.
- Train laboratory staff to comply with the Management program.
- Conduct annual inspections and surprise periodic inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No spills or releases occurred from use of these containers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. The condition of these containers did not present a potential leakage hazard.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.52(e)	<i>Date Detected:</i> 02/01/01
<i>Nature of the violation:</i> Failure to document all responsibilities of emergency coordinator in contingency plan.	
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering Inc.	
<i>Describe how the violation was detected:</i> The auditor reviewed the written contingency plan with regard to contents described in 40 CFR 265.52.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> 02/14/2001 <i>Description of how the violation was corrected:</i> The information was written into the contingency plan.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> This was a documentation error. No environmental or human harm was caused by the violation..	

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A Standard Operating Procedure (SOP) was prepared indicating that the plan should be reviewed. Also, EHSO will conduct annual environmental audits to evaluate compliance and develop an action plan for any identified items of non-compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This was a documentation error. The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. The contingency plan, as written, described the major responsibilities of the emergency coordinator.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

This was a documentation error. The violation did not present an imminent and substantial endangerment to human health or the environment.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE		
<table border="1"> <tr> <td><i>Specific Requirement Involved:</i> 40 CFR 262.41</td> <td><i>Date Detected:</i> 02/01/01</td> </tr> </table>	<i>Specific Requirement Involved:</i> 40 CFR 262.41	<i>Date Detected:</i> 02/01/01
<i>Specific Requirement Involved:</i> 40 CFR 262.41	<i>Date Detected:</i> 02/01/01	
<i>Nature of the violation:</i> Failure to report waste minimization information on annual reports (1997-1999)		
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering Inc.		
<i>Describe how the violation was detected:</i> The auditor reviewed IEPA Annual Hazardous Waste reports provided by UIC for the 1997-1999 reporting years. The required content of the report was complete, except for a description of the changes in volume and toxicity of waste achieved through waste minimization activities.		

VII. CONDITION 5 - CORRECTION AND REMEDIATION		
<table border="1"> <tr> <td><i>Has this violation been corrected?</i></td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</td> </tr> </table>	<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, when was it corrected?</i> 2/16/2001 <i>Description of how the violation was corrected:</i> Information was not being collected from throughout the campus to provide the necessary description of waste minimization efforts because of the informal program status. This information is now collected for the next Annual Hazardous Waste Report. Included in the information is efforts undertaken by our voluntary environmental Green Council and a significant reduction in our mixed waste through a decrease in scintillation vials.		
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i> 		
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> This violation was an information collection error. No environmental or human harm was caused by the violation.		

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

An informal program of chemical waste minimization was in place but no formal reporting was performed. A formal waste minimization policy and program will be developed put into place. A formal waste minimization program was in place for mixed radioactive waste but no reporting was being performed.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation was an information collection error. The violation did not result in serious actual harm to human health or the environment. Waste is managed in an environmentally sound manner. Waste minimization has taken place on campus in an informal manner.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Site inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE		
<table border="1"> <tr> <td><i>Specific Requirement Involved:</i> 40 CFR 262.34</td> <td><i>Date Detected:</i> 02/01/01</td> </tr> </table>	<i>Specific Requirement Involved:</i> 40 CFR 262.34	<i>Date Detected:</i> 02/01/01
<i>Specific Requirement Involved:</i> 40 CFR 262.34	<i>Date Detected:</i> 02/01/01	
<i>Nature of the violation:</i> Failure to properly label waste containers in the Environmental Safety Facility.		
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering		
<i>Describe how the violation was detected:</i> The auditors inspected the 90 day storage facility and found three full drums in front of the vaults that were not labeled.		

VII. CONDITION 5 - CORRECTION AND REMEDIATION			
<table border="1"> <tr> <td><i>Has this violation been corrected?</i></td> <td><input checked="" type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>	<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
<i>If yes, when was it corrected?</i> 06/12/2000, the day of the site walk-through.			
<i>Description of how the violation was corrected:</i> Proper labels were placed on the containers.			
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>			
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by the violation.			

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Personnel will be provided with refresher training regarding labeling of waste containers at the time waste accumulation is begun. Weekly inspections will be conducted to verify drums are properly labeled. Labels have been added to our inspection checklist.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No spills, releases, or improper disposals occurred as a result of failure to label. Facility staff were aware of drum contents and were preparing to label them.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Physical Plant, 1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.40

Failure to keep necessary records - manifests - for at least three years.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 2/20/2001

Description of how the violation was corrected:

The facility will keep all manifests for at least three years after the waste was accepted by the initial transporter.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

This was a record retention problem. There is no evidence environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

In addition the following steps will be taken:

- Prepare and execute standardized management program for RCRA,
- Train additional facility staff for complying with the program,
- Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

• CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

• CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
This violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None.

• CONDITION 9 - COOPERATION
Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.
The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

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II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<p><i>Specific Requirement Involved:</i> 40 CFR 262.34</p> <p>Failure to label drums of hazardous waste with accumulation start date and "Hazardous waste"</p>

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>If yes, when was it corrected?</i> _____ 2/20/2001 _____</p> <p><i>Description of how the violation was corrected:</i></p> <p>Hazardous Waste labels have been sent to the Utilities Office for placement on the drum.</p>	
<p><i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i></p>	
<p><i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i></p> <p>No environmental or human harm was caused by the violation.</p>	

VIII. CONDITION 6 - PREVENT RECURRENCE
<p><i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i></p> <p>A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.</p> <p>EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.</p>

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
This violation did not result in serious actual harm to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

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II. CONDITION 1 - SYSTEMATIC DISCOVERY

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- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
UIC Physical Plant, 1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<p><i>Specific Requirement Involved:</i> 40 CFR 265.52(c)</p> <p>Failure to include description of arrangements with outside responding agencies in contingency plan.</p>

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
Has this violation been corrected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>If yes, when was it corrected? <u>February 15, 2001</u></p> <p><i>Description of how the violation was corrected:</i></p> <p>Description of arrangements was expanded in text of Contingency plan. Contingency plan was faxed to appropriate authorities.</p>	
<p><i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i></p>	
<p><i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i></p> <p>This was a documentation violation with no environmental or human harm.</p>	

VIII. CONDITION 6 - PREVENT RECURRENCE
<p><i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i></p> <p>An SOP was prepared indicating that the plan should be reviewed. Also EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.</p>

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility and the contingency plan was not activated.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment as the contingency plan had been submitted to authorities in the past and the respective responsibilities were understood.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
none

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Science and Engineering Laboratories (SEL), 900 W. Taylor St., Chicago, IL 60607
Science and Engineering South (SES), 845 W. Taylor St., Chicago, IL 60607
UIC Medical Center (UICMC), 1740 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Failure to label waste containers in satellite accumulation areas located in rooms 3202, 3209 and 3214 SEL, 3317, 3319, 3363, 3455, 4226, 4255, 4259, 4225, 4355, 4455-4463, 5115, 5119, 5125, and 5223 SES, and 3130 UICMC.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? The week of 2/5/2001.

Description of how the violation was corrected: Proper labels were affixed to the containers by the hazardous waste collection staff at time of collection.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers. In addition the following steps will be taken:

- Prepare and execute standardized Management program for RCRA compliance.
- Train laboratory staff to comply with the Management program.
- Conduct annual inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified.
- Provide instruction to laboratory managers and repeat information on EHS website.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i> Not Applicable	
<i>Similar violations at the parent company?</i> Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
<i>State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not result in serious actual harm to human health or the environment. Most of these were 5 gallon containers used for solvent waste and the waste generators knew what they contained. This waste was labeled at the time of collection and properly disposed of by the hazardous waste collection staff.
<i>State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
<i>Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.</i> None

XI. CONDITION 9 - COOPERATION
<i>Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.</i> The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
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Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 265.16
Failure to document annual review of training manual and failure to document job titles, employees and responsibilities for hazardous waste operations.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> February 14, 2001	
<i>Description of how the violation was corrected:</i> The SOPs for training were updated to include an annual refresher requirement. A personnel file with required information is maintained in the waste facility office and the main EHSO office.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i>	
This was a record keeping violation. No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i>
The EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i>	
Not Applicable	
<i>Similar violations at the parent company?</i>	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. No incidents occurred involving personnel who collect or handle hazardous waste.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

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Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Science and Engineering Laboratories (SEL), 900 W. Taylor St., Chicago, IL 60607 Science and Engineering South (SES), 845 W. Taylor St., Chicago, IL 60607 UIC Medical Center, 1740 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 265.173 Failure to close waste containers in satellite accumulation areas located in rooms 3202 and 3214 SEL, 3317, 3319, 3363, and 5223 SES and 3130 UICMC.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
Has this violation been corrected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> The week of February 5, 2001.	
<i>Description of how the violation was corrected:</i> Proper labels were affixed to the containers by the hazardous waste collection staff at time of collection.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i> A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to keep waste collection containers closed when not in use. In addition the following steps will be taken: <ul style="list-style-type: none"> • Prepare and execute standardized Management program for RCRA compliance. • Train laboratory staff to comply with the Management program. • Conduct annual inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified. • Conduct periodic surprise inspections to evaluate compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number. Not Applicable	
Similar violations at the parent company? Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion. The violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation and the containers were routinely closed at the end of the work day.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion. The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements. None

XI. CONDITION 9 - COOPERATION
Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy. The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

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U S EPA
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CHICAGO IL 60604
ATTN DAN CHACHAKIS DE-9J



Waste, Pesticides and Toxics I

U.S. EPA
77 W JACKSON BLVD
CHICAGO IL 60604
ATTN DAN CHACHAKIS

DE-9J

Type of Document:

- ☒ Notice of Determination
☐ Notice of Violation and Inspection Report
☐ No Violation Letter and Inspection Report
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

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Certified Fee 2.30
Return Receipt Fee (Endorsement Required) 1.75
Restricted Delivery Fee (Endorsement Required) 8.00

Postmark Here

Facility Name: University of Illinois

Facility Location: 1140 South Paulina

City: Chicago State: IL

U.S. EPA ID# IL0984910414

Assigned Staff Dan Chachakis Phone: 69871

DR ART SAVAGE
INTERIM VICE CHANCELLOR FOR ADMINISTRATION
UNIVERSITY OF ILLINOIS AT CHICAGO (MC 106)
1140 SOUTH PAULINA STREET
CHICAGO IL 60612-721

Name	Signature	Date
Author	Robert Gunther	9/30/04
Regional Counsel	Robert Gunther	9/30/04
Section Chief	Corna Tereza	9/30/04
Branch Chief	Corna Tereza for B.C.	9/30/04

Directions/Request for Clerical Support:

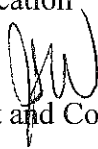
After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
One copy for the assigned staff;
One copy for the section file;
One copy for the branch file; and
One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

* one extra for Corna

ILD 984910414

MEMORANDUM

SUBJECT: Self-Disclosure Notification
FROM: Jodi Swanson-Wilson 
Office of Enforcement and Compliance Assurance
TO: Andrew Tschampa
DATE: March 5, 2001

The Office of Enforcement and Compliance and Assurance is in receipt of a Self Disclosure Notification from *University of Illinois at Chicago*. I have included the original letter for your records. Please notify me upon assignment of a Program Contact Person and of the ORC Attorney assigned. I will forward all future information that we receive regarding this case directly to the Program Contact(s) assigned.

NOTE: Please indicate, on the Attorney Assignment Request Form, that this is a self-disclosure case. Also include the date of the disclosure so that the case can be entered into **DOCKET** accurately.

UNIVERSITY OF ILLINOIS
AT CHICAGO

Office of the Vice Chancellor for Administration (MC 106)
1140 South Paulina Street
Chicago, Illinois 60612-7217

Stanton Delaney, PhD
Vice Chancellor for Administration
Executive Director—South Campus Development

February 20, 2001

Tinka Hyde, Regional Team Manager
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency, Region 5 E-19J
77 West Jackson Boulevard Chicago, Illinois 60604

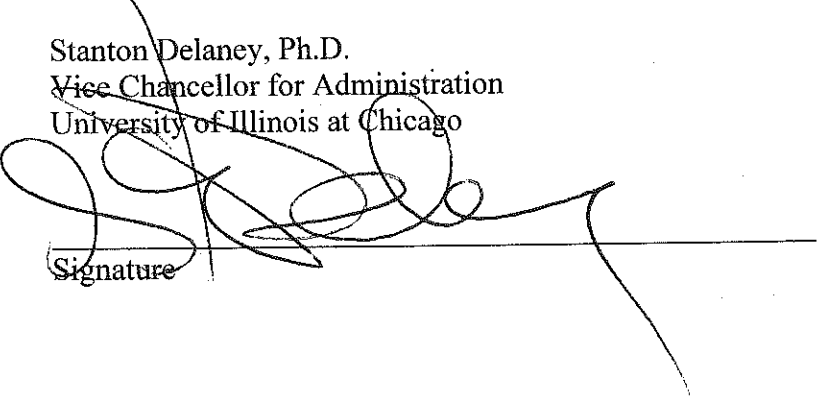
Dear Ms. Hyde:

The University of Illinois at Chicago has taken a proactive position towards environmental stewardship. As part of our focus on developing a culture of environmental responsibility, we contracted independent third party resources to perform a four-phase voluntary regulatory compliance audit. We have discovered violations that we are self-disclosing for consideration under the EPA Audit Policy. Each violation is disclosed on a separate enclosed Voluntary Disclosure Statement. It is our intent not only to correct these violations in the prescribed time frame, but to complete the development and implementation of an Environmental Management System that will enable us to be a role model for our students and our community.

I certify that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information contained in or accompanying this document is true, accurate, and complete.

In closing, I request that any public disclosure of the information contained herein be withheld pending appropriate discussions between our respective offices.

Stanton Delaney, Ph.D.
Vice Chancellor for Administration
University of Illinois at Chicago


Signature

UIC



K.S. Guenther/C-145
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

ILD984910414

JUL 25 2000

REPLY TO THE ATTENTION OF

DT-8J

CERTIFIED MAIL

Receipt No. 7099 3400 0000 9600 8096

Ms. Mary C. Musetti
Environmental, Health, and Safety Officer
Johnson Matthey Ceramics, Incorporated
4820 Industrial Drive
Fairfield, Ohio 45014

Re: Notice of Violation; Final Determination
Self-Disclosure of a TSCA Violation by Johnson Matthey Ceramics, Incorporated,
Pursuant to the U.S. EPA's Audit Policy

Dear Ms. Musetti:

The United States Environmental Protection Agency, Region 5, has received your letters dated August 17 and September 3, 1999, together with supplemental information we requested regarding a red azo pigment manufactured at your Fairfield, Ohio facility. We acknowledge your claim of confidentiality on this information.

In your August 17, 1999 letter, you disclosed a potential violation under the Toxic Substances Control Act (TSCA) at the Fairfield, Ohio location discovered while preparing an environmental, health and safety audit. You also described the corrective actions undertaken to comply with TSCA. This letter establishes our final determination that the facts of this case warrant a Notice of Warning as discussed below:

NOTICE OF WARNING

We have determined, based on information in correspondence dated August 17 and September 3, 1999 and supplemental information submitted, that Johnson Matthey Ceramics, Incorporated violated TSCA at its Fairfield, Ohio facility as follows:

- U.S. EPA promulgated the Inventory Update Rule (IUR), codified at 40 C.F.R. Part 710, pursuant to the authority of TSCA § 8(a), 15 U.S.C. § 2607(a).

- The IUR requires submission of IUR Reports to U.S. EPA on or before the end of specified reporting periods, detailing information on chemicals manufactured or imported in amounts greater than 10,000 pounds during the company's last complete fiscal year prior to the beginning of a particular reporting period. An IUR reporting period began August 25, 1998 and ended December 23, 1998.
- Johnson Matthey's last complete corporate fiscal year, prior to August 25, 1998 was the year of 1997. During the calendar year, Johnson Matthey produced greater than 10,000 pounds of red azo pigment, which is subject to the IUR rule. Johnson Matthey should have submitted the 1998 IUR Report for this chemical before December 23, 1998. Johnson Matthey's late submission of the 1998 Inventory Update Report constitutes a violation of 40 C.F.R. Part 710 and Section 8(a) of TSCA, 15 U.S.C. § 2607(a).

FINAL DETERMINATION


Based upon the information provided in your letters of August 17 and September 3, 1999 and the supplemental information, we have determined that we will not seek any penalty against Johnson Matthey Ceramics, Incorporated for the TSCA violation described above. Johnson Matthey has met the conditions for a 100 percent reduction in the gravity based penalty under the Audit Policy.

However, please note that the violation described in the Notice of Warning is a "previous violation" of TSCA under the Audit Policy's "repeat violation" provision if Johnson Matthey violates the same or similar provisions of TSCA within the next five years.

Also, note that our determination does not provide relief from or a basis to mitigate penalties related to any Federal, state or local actions that may result from the discovery of environmental concerns Johnson Matthey did not specifically identify or disclose in its letters. We reserve the right to take any actions authorized by any other statutory authority.

We appreciate your willingness to self-police, disclose, and correct violations in a timely manner. Should you have any questions, please contact Tony Silvasi, of my staff, at (312) 886-6878, or Robert S. Guenther, Associate Regional Counsel, at (312) 886-0566.

Sincerely,

 for

Phyllis A. Reed, Chief
Pesticides and Toxics Branch

U.S. ENVIRONMENTAL
PROTECTION AGENCY

JUL 26 2000

OFFICE OF REGIONAL
COUNSEL

TO RCRA

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Representative: Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Review of records and reports by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001
- C. *Relationship Between Auditors and UIC* - Boelter & Yates Inc. was hired by UIC to perform a voluntary audit for EPA/IEPA asbestos, lead paint, and underground storage tanks laws as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

UIC Campus c/o 1140 S. Paulina St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 261.24

Failure to perform testing of paint chip debris to determine disposal requirements.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

50 days to complete and implement a campus-wide Lead Based Paint Management Program with review and approval by EHS licensed LBP Inspector and Risk Assessor.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any environmental or human harm.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Within 50 days a Lead Based Paint Management Program, currently in draft form, will be implemented. This Program addresses all necessary components to insure proper testing for and disposal of lead based paint. Program dissemination and training will be provided by EHS staff to all applicable personnel.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any environmental or human harm.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

There has been no evidence that paint chip debris from the University of Illinois at Chicago has caused any imminent and substantial endangerment to human health or the environment.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Boelter & Yates to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.174

(264.174)

Failure to document inspections of 90-day storage facility

There is no
requirement to
document inspection

VII. CONDITION 5 - CORRECTION AND REMEDIAL ACTION

Has this violation been corrected?

[X]

If yes, when was it corrected? 2/20/2001

Description of how the violation was corrected:

An inspection checklist has been sent to the Utilities Office for implementation.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Employees will be informed of the inspection program. In addition the following steps will be taken:

- Prepare and execute standardized management program for RCRA,
- Train the staff for complying with the program,
- Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

• CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number. Not Applicable	
Similar violations at the parent company? Not Applicable	

• CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion. This violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion. The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements. None.

• **CONDITION 9 - COOPERATION**

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 262.34
Failure to ship a drum of hazardous waste within 90 days as required for Large Quantity Generator.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> June 24, 2000 and 2/01/2001	
<i>Description of how the violation was corrected:</i> Waste was shipped 2 days late according to records. Since identification of the violation, a revised inventory procedure was established..	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i>	
No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i>
A physical inventory and electronic inventory of items remaining in storage is conducted monthly, after each waste shipment. At that time any remaining items are evaluated to determine future shipping dates.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i>	
Not Applicable	
<i>Similar violations at the parent company?</i>	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. Waste collected on March 23, 2000 was shipped on June 23, 2000. This exceeded the time limit by 2 days.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

UIC Steam Plant, 1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.52 (c)

Failure to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response services.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ [X] Yes

☐ [] No

If yes, when was it corrected? ____ February 15, 2001 ____

Description of how the violation was corrected:

Description of arrangements was expanded in text of Contingency plan. Contingency plan was faxed to appropriate authorities.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

An SOP was prepared indicating that the plan should be reviewed. Also EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility and the contingency plan was not activated.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment as the contingency plan had been submitted to authorities in the past and the respective responsibilities were understood.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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1140 S. Paulina St.
Chicago, IL 60612

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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Clinical Sciences North
820 S. Wood St.
Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.174

Date of Discovery

Nature of the violation:

Inspection records for mixed radioactive waste containers were not maintained

Identify who discovered the violation:

Outside Auditor - Hygieneering

Describe how the violation was detected:

Inspection of mixed waste storage facility.

Records for
weekly
Container
inspection
not required

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? By February 02, 2001

Description of how the violation was corrected: An inspection log form was created and weekly inspections were initiated.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

The inspection log is routinely checked for completion by the mixed waste supervisor.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. In the past periodic inspections of containers were performed, but not necessarily at the required frequency and records were not maintained. However, no leakage or container deterioration was ever noted including during the transfer of waste to licensed brokers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. Quantities involved are small, less than 30 gallons are accumulated at any one time. Containers have not leaked and the storage area was and is visited at least a few times each week.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Clinical Sciences North 820 S. Wood St. Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.51	<i>Date of Discovery:</i> February 01, 2001
<i>Nature of the violation:</i> The contingency plan does not include the area in which mixed radioactive waste is stored.	
<i>Identify who discovered the violation:</i> Outside auditor - Hygieneering	
<i>Describe how the violation was detected:</i> Contingency plan review.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>If yes, when was it corrected?</i>	
<i>Description of how the violation was corrected:</i>	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i> A contingency plan will be completed and approved within 60 days of disclosure. First draft is being reviewed at this time.	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by this violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i> A contingency plan will be authored for the mixed radioactive waste storage area. The plan will be approved by the UIC Radiation Safety Officer and EHSO Director and will be reviewed as required on an annual basis. Authoring and approval of the manual plan will be completed within 60 days of discovery.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

Failure to have a contingency plan did not result in serious actual harm to human health or the environment. Emergency procedures for cleaning radioactive material spills were in place. All personnel who handle waste are provided with extensive training. An emergency response kit is available and is periodically inspected to ensure the contents are intact.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

This violation did not present an imminent and substantial endangerment to human health or the environment. See above information for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
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Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1140 South Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Failure to label drums of hazardous waste

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☐ Yes

☒ No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Identification of the contents of the drum was provided today by the Utilities Director. They were left by an old contractor and allowed to just sit there. They were closed but not labeled. There were no leaks. Preparations are underway 2/20/2001 for proper labeling and removal.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

[] Yes
[X] No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. The employees did not handle the drums and no releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

None.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Environmental Safety Facility
1110 S. Paulina
Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.173

Failure to securely close or seal waste containers.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? Week of February 5, 2001

Description of how the violation was corrected: The container, which could not be sealed, was overpacked pending shipment to an authorized waste broker.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Instructions are being provided to waste generators in a Hazardous Waste Management manual that instructs personnel who generate waste to collect waste only in containers in good condition with screw top lids. Waste will not be collected from satellite accumulation areas if it is not properly closed or sealed.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. These containers were less than 1 liter in size and were closed. Secondary containment was provided for them during transport and storage at the waste storage facility. No spills or releases occurred from these containers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262 and 265 Subparts A through E

Failure to label and manage a drum of parts washer solvent as a hazardous waste.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

[] Yes

[X] No

If yes, when was it corrected? _____

Description of how the violation was corrected:

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

The material has been identified as mineral spirits. A hazardous waste manual is currently being completed that will be distributed to Facilities Maintenance. Also, FM employees will be instructed to keep the waste collection container properly label .

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

The drum will be properly disposed when filled. There is no evidence of environmental or human harm caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

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Phone: (312) 413-8732
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email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.56	<i>Date Detected:</i> 02/01/01
<i>Nature of the violation:</i> Failure to document available emergency equipment in contingency plan.	
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering Inc.	
<i>Describe how the violation was detected:</i> The auditor reviewed the written contingency plan with regard to listing of emergency equipment.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> 2./16/01 <i>Description of how the violation was corrected:</i> The list of equipment was included in the contingency plan.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A Standard Operating Procedure (SOP) was prepared indicating that the plan should be reviewed. Also, EHSO will conduct annual environmental audits to evaluate compliance and develop an action plan for any identified items of non-compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. Adequate decontamination equipment was available and all emergency response personnel knew its location. This was a failure to document only.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. Adequate decontamination equipment was available and all emergency response personnel knew its location. This was a failure to document only.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
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Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Clinical Sciences North 820 S. Wood St. Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 165.16	<i>Date of Discovery:</i> February 01, 2001
<i>Nature of the violation:</i> Personnel handling mixed radioactive wastes were not trained in all aspects of 40 CFR 165.16.	
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering	
<i>Describe how the violation was detected:</i> Review of training records by auditor.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>If yes, when was it corrected?</i> _____	
<i>Description of how the violation was corrected:</i> This violation will be corrected within 60 days of discovery.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i> No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i> Training topics required by 40 CFR 265.16 will be added to the training module for collection and storage of mixed radioactive waste. Annual refresher training will be provided as required. Departmental management will periodically review training records to ensure compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i> Not Applicable	
<i>Similar violations at the parent company?</i> Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
<i>State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not result in serious actual harm to human health or the environment. All personnel collecting and storing mixed radioactive waste have a significant amount of radiation safety training including a 6 hour course in general radiation safety topics. In addition they have completed several department training modules regarding the specific jobs they are expected to perform, including collection and storage of radioactive waste. All personnel functioning in this capacity are closely supervised.
<i>State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not present an imminent and substantial endangerment to human health or the environment. See comments above for rationale.
<i>Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.</i> None

XI. CONDITION 9 - COOPERATION
<i>Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.</i> The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Science and Engineering Laboratories
900 W. Taylor
Chicago, IL

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.171

Failure to use containers in good condition in satellite accumulation area in room 3202 SEL. Pour spouts were cut off of waste containers.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? The week of February 5, 2001.

Description of how the violation was corrected: The waste was transferred to a container that was in good condition.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to use containers in good condition. In addition the following steps will be taken:

- Prepare and execute standardized Management program for RCRA compliance.
- Train laboratory staff to comply with the Management program.
- Conduct annual inspections and surprise periodic inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

[] Yes
[X] No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No spills or releases occurred from use of these containers.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. The condition of these containers did not present a potential leakage hazard.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

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1140 S. Paulina St.
Chicago, IL 60612

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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 265.52(e)	<i>Date Detected:</i> 02/01/01
<i>Nature of the violation:</i> Failure to document all responsibilities of emergency coordinator in contingency plan.	
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering Inc.	
<i>Describe how the violation was detected:</i> The auditor reviewed the written contingency plan with regard to contents described in 40 CFR 265.52.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> 02/14/2001	
<i>Description of how the violation was corrected:</i> The information was written into the contingency plan.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> This was a documentation error. No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A Standard Operating Procedure (SOP) was prepared indicating that the plan should be reviewed. Also, EHSO will conduct annual environmental audits to evaluate compliance and develop an action plan for any identified items of non-compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This was a documentation error. The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility requiring activation of the contingency plan. The contingency plan, as written, described the major responsibilities of the emergency coordinator.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

This was a documentation error. The violation did not present an imminent and substantial endangerment to human health or the environment.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE	
<i>Specific Requirement Involved:</i> 40 CFR 262.41	<i>Date Detected:</i> 02/01/01
<i>Nature of the violation:</i> Failure to report waste minimization information on annual reports (1997-1999)	
<i>Identify who discovered the violation:</i> Outside auditors - Hygieneering Inc.	
<i>Describe how the violation was detected:</i> The auditor reviewed IEPA Annual Hazardous Waste reports provided by UIC for the 1997-1999 reporting years. The required content of the report was complete, except for a description of the changes in volume and toxicity of waste achieved through waste minimization activities.	

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> 2/16/2001	
<i>Description of how the violation was corrected:</i> Information was not being collected from throughout the campus to provide the necessary description of waste minimization efforts because of the informal program status. This information is now collected for the next Annual Hazardous Waste Report. Included in the information is efforts undertaken by our voluntary environmental Green Council and a significant reduction in our mixed waste through a decrease in scintillation vials.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i> This violation was an information collection error. No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

An informal program of chemical waste minimization was in place but no formal reporting was performed. A formal waste minimization policy and program will be developed put into place. A formal waste minimization program was in place for mixed radioactive waste but no reporting was being performed.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation was an information collection error. The violation did not result in serious actual harm to human health or the environment. Waste is managed in an environmentally sound manner. Waste minimization has taken place on campus in an informal manner.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Site inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Environmental Safety Facility
1110 S. Paulina
Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Date Detected: 02/01/01

Nature of the violation:

Failure to properly label waste containers in the Environmental Safety Facility.

Identify who discovered the violation:

Outside auditors - Hygieneering

Describe how the violation was detected:

The auditors inspected the 90 day storage facility and found three full drums in front of the vaults that were not labeled.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 06/12/2000, the day of the site walk-through.

Description of how the violation was corrected: Proper labels were placed on the containers.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

Personnel will be provided with refresher training regarding labeling of waste containers at the time waste accumulation is begun. Weekly inspections will be conducted to verify drums are properly labeled. Labels have been added to our inspection checklist.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes

☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No spills, releases, or improper disposals occurred as a result of failure to label. Facility staff were aware of drum contents and were preparing to label them.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

There are no environmental federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates. Consequently, there are no violations of any specific terms of such orders.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

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Chicago, IL 60612

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Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Physical Plant, 1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.40

Failure to keep necessary records - manifests - for at least three years.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 2/20/2001

Description of how the violation was corrected:

The facility will keep all manifests for at least three years after the waste was accepted by the initial transporter.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

This was a record retention problem. There is no evidence environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

In addition the following steps will be taken:

- Prepare and execute standardized management program for RCRA,
- Train additional facility staff for complying with the program,
- Conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

• CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

• CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
This violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None.

• CONDITION 9 - COOPERATION
Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.
The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

1717 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Failure to label drums of hazardous waste with accumulation start date and "Hazardous waste"

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? 2/20/2001

Description of how the violation was corrected:

Hazardous Waste labels have been sent to the Utilities Office for placement on the drum.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers.

EHSO will prepare and execute standardized management program for RCRA, train the staff for complying with the program, and conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.	
Not Applicable	
Similar violations at the parent company?	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.
This violation did not result in serious actual harm to human health or the environment. The employees in the area were aware of what the drums contained and no releases or exposures occurred.
State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.
The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.
None.

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

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1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

UIC Physical Plant, 1140 S. Morgan St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.52(c)

Failure to include description of arrangements with outside responding agencies in contingency plan.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? February 15, 2001

Description of how the violation was corrected:

Description of arrangements was expanded in text of Contingency plan. Contingency plan was faxed to appropriate authorities.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

This was a documentation violation with no environmental or human harm.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.
An SOP was prepared indicating that the plan should be reviewed. Also EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No emergencies occurred at the facility and the contingency plan was not activated.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment as the contingency plan had been submitted to authorities in the past and the respective responsibilities were understood.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

none

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Science and Engineering Laboratories (SEL), 900 W. Taylor St., Chicago, IL 60607
Science and Engineering South (SES), 845 W. Taylor St., Chicago, IL 60607
UIC Medical Center (UICMC), 1740 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 262.34

Failure to label waste containers in satellite accumulation areas located in rooms 3202, 3209 and 3214 SEL, 3317, 3319, 3363, 3455, 4226, 4255, 4259, 4225, 4355, 4455-4463, 5115, 5119, 5125, and 5223 SES, and 3130 UICMC.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? The week of 2/5/2001.

Description of how the violation was corrected: Proper labels were affixed to the containers by the hazardous waste collection staff at time of collection.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to properly label waste collection containers. In addition the following steps will be taken:

- Prepare and execute standardized Management program for RCRA compliance.
- Train laboratory staff to comply with the Management program.
- Conduct annual inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified.
- Provide instruction to laboratory managers and repeat information on EHS website.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i> Not Applicable	
<i>Similar violations at the parent company?</i> Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED
<i>State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not result in serious actual harm to human health or the environment. Most of these were 5 gallon containers used for solvent waste and the waste generators knew what they contained. This waste was labeled at the time of collection and properly disposed of by the hazardous waste collection staff.
<i>State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.</i> The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.
<i>Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.</i> None

XI. CONDITION 9 - COOPERATION
<i>Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.</i> The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

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I. GENERAL INFORMATION

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Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Records inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED
Environmental Safety Facility 1110 S. Paulina Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE
<i>Specific Requirement Involved:</i> 40 CFR 265.16
Failure to document annual review of training manual and failure to document job titles, employees and responsibilities for hazardous waste operations.

VII. CONDITION 5 - CORRECTION AND REMEDIATION	
<i>Has this violation been corrected?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, when was it corrected?</i> February 14, 2001	
<i>Description of how the violation was corrected:</i> The SOPs for training were updated to include an annual refresher requirement. A personnel file with required information is maintained in the waste facility office and the main EHSO office.	
<i>If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.</i>	
<i>Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.</i>	
This was a record keeping violation. No environmental or human harm was caused by the violation.	

VIII. CONDITION 6 - PREVENT RECURRENCE
<i>Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.</i>
The EHSO will conduct annual environmental audits to evaluate compliance and develop action plans for any identified non-compliance issues.

IX. CONDITION 7 - NO REPEAT VIOLATIONS	
<i>Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.</i>	
Not Applicable	
<i>Similar violations at the parent company?</i>	
Not Applicable	

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

This violation did not result in serious actual harm to human health or the environment. No incidents occurred involving personnel who collect or handle hazardous waste.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See information above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders of agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.

EPA VOLUNTARY DISCLOSURE STATEMENT

This form is based on the optional EPA form for voluntary disclosure under the Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations).

I. GENERAL INFORMATION

Institution: University of Illinois at Chicago

Administration Representative: Stanton Delaney, Ph.D., Vice Chancellor for Administration
Office of the Vice Chancellor for Administration, M/C 106
1140 S. Paulina St.
Chicago, IL 60612

Authorized Contact: Marilyn Hau, Director of Environmental Health and Safety
Environmental Health and Safety Office, M/C 645
1140 S. Paulina St.
Chicago, IL 60612

Phone: (312) 413-8732
Fax No.: (312) 413-3700
email: mhau@uic.edu

II. CONDITION 1 - SYSTEMATIC DISCOVERY

- A. *Discovery Method* - Visual inspection by independent auditor.
- B. *Audit Schedule* - Reported February 1, 2001.
- C. *Relationship Between Auditors and UIC* - Hygieneering Inc. was hired by UIC to perform a voluntary audit for the EPA /IEPA Resource Conservation and Recovery Act as a proactive measure to insure compliance.
- D. *Previous Audits* - none

III. CONDITION 2 - VOLUNTARY DISCOVERY

These violations were not detected by any pre-existing legally mandated monitoring, sampling, or auditing procedures.

IV. CONDITION 3 - PROMPT DISCLOSURE

This violation was disclosed within 21 days after it was discovered.

V. CONDITION 4 - DISCOVERY AND DISCLOSURE INDEPENDENT OF GOVERNMENT OR THIRD PARTY PLAINTIFF

This disclosure is not the result of a state inspection, local inspection, state or local information request, notice of a citizen suit, or a legal complaint by a third party that occurred within the last 18 months.

PHYSICAL LOCATION WHERE THE VIOLATION OCCURRED

Science and Engineering Laboratories (SEL), 900 W. Taylor St., Chicago, IL 60607
Science and Engineering South (SES), 845 W. Taylor St., Chicago, IL 60607
UIC Medical Center, 1740 W. Taylor St., Chicago, IL 60612

VI. SUMMARY OF THE DISCLOSURE

Specific Requirement Involved: 40 CFR 265.173

Failure to close waste containers in satellite accumulation areas located in rooms 3202 and 3214 SEL, 3317, 3319, 3363, and 5223 SES and 3130 UICMC.

VII. CONDITION 5 - CORRECTION AND REMEDIATION

Has this violation been corrected?

☒ Yes

☐ No

If yes, when was it corrected? The week of February 5, 2001.

Description of how the violation was corrected: Proper labels were affixed to the containers by the hazardous waste collection staff at time of collection.

If no, provide an estimate of the length of time it will take to correct the action. If more than 60 days will be needed to correct the violation, please explain the basis for this estimate and provide the opinion of any technical or engineering expert relied upon to arrive at the estimate.

Describe any environmental or human harm caused by the violation, and any measures undertaken to remediate such harm.

No environmental or human harm was caused by the violation.

VIII. CONDITION 6 - PREVENT RECURRENCE

Describe what steps were taken to prevent recurrence of the violation and when those measures were implemented. If the measures have not yet been implemented, describe the implementation schedule.

A hazardous waste manual is currently being completed that will be distributed to generators and will also be available on the UIC EHSO web site. This manual instructs waste generators to keep waste collection containers closed when not in use. In addition the following steps will be taken:

- Prepare and execute standardized Management program for RCRA compliance.
- Train laboratory staff to comply with the Management program.
- Conduct annual inspections to evaluate compliance status and develop action plans for any non-compliance issues that are identified.
- Conduct periodic surprise inspections to evaluate compliance.

IX. CONDITION 7 - NO REPEAT VIOLATIONS

Has the same violation (or a closely related violation) occurred at the same facility within the past 3 years?

☐ Yes
☒ No

Describe the corporate structure, including all parent and subsidiary corporations. At a minimum, provide the parent company's name and Dun & Bradstreet Number.

Not Applicable

Similar violations at the parent company?

Not Applicable

X. CONDITION 8 - OTHER VIOLATIONS EXCLUDED

State whether or not the violation resulted in serious actual harm to human health or the environment; provide your rationale for making this conclusion.

The violation did not result in serious actual harm to human health or the environment. No spills or releases occurred as a result of the violation and the containers were routinely closed at the end of the work day.

State whether or not the violation may have presented an imminent and substantial endangerment to human health or the environment; provide your rationale for making this conclusion.

The violation did not present an imminent and substantial endangerment to human health or the environment. See explanation above for rationale.

Identify all environmental Federal, state, or local judicial or administrative orders, or consent agreements under which this facility operates; state whether the violation violated any specific terms of these orders or agreements.

None

XI. CONDITION 9 - COOPERATION

Provide any other information you deem relevant that demonstrates your cooperation as requested by the EPA in determining applicability of this policy.

The violation was described by Hygieneering Inc. to the Director of Environmental Health and Safety. The Director verified the violation and promptly reported this to University Administration. The decision to report this violation under the EPA Audit Policy was issued to the Director that same day, February 1, 2001.